

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)
) Chapter 11
)
YELLOW CORPORATION, *et al.*,¹) Case No. 23-11069 (CTG)
)
Debtors.) (Jointly Administered)
)
) **Re: Docket No. __**

**ORDER (I) ENLARGING THE PERIOD WITHIN WHICH THE
DEBTORS MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”) (a) enlarging the Removal Period for filing notices of removal of the Actions by 120-days, up to and including February 21, 2026, without prejudice to the Debtors’ right to seek further extensions, and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The time period provided by Bankruptcy Rule 9027 within which the Debtors, or the Liquidating Trustee, as applicable, may file notices of removal of related proceedings under Bankruptcy Rule 9027(a)(2) is enlarged and extended through and including February 21, 2026.
3. The Prepetition Removal Deadline applies to all matters specified in Bankruptcy Rule 9027(a)(2)(A), (B), (C).
4. The time period provided by Bankruptcy Rule 9027 within which the Debtors, or the Liquidating Trustee, as applicable, may file notices of removal of related proceedings under Bankruptcy Rule 9027(a)(3) is enlarged and extended to the later of (i) February 21, 2026, and (ii) the time period specified in Bankruptcy Rule 9027(a)(3)(A) and (B).
5. The Postpetition Removal Deadline applies to all matters specified in Bankruptcy Rule 9027(a)(3).
6. This Order is without prejudice to the Debtors’, or Liquidating Trustee’s, as applicable, right to request a further extension of time to file notices of removal of any or all of the Actions.
7. This Order shall be without prejudice to any position the Debtors may take regarding whether section 362 of the Bankruptcy Code applies to stay any Action.
8. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

10. The Debtors, or the Liquidating Trustee, as applicable, are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.